

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re:

BLUEWORKS CORPORATION,  
  
Debtor<sup>1</sup>

Chapter 11

Case No. 24-30494 (LTB)

**HAYWARD INDUSTRIES, INC.'S JOINDER IN BANKRUPTCY ADMINISTRATOR'S  
MOTION FOR ENTRY OF AN ORDER: (I) CONVERTING CASE TO A CHAPTER 7  
LIQUIDATION OR (II) DISMISSING CASE**

Hayward Industries, Inc. hereby joins in the relief sought by the Motion for Entry of an Order: (I) Converting Case to a Chapter 7 Liquidation or (ii) Dismissing Case (Doc. No. 294). The Motion should be granted because (i) the Contempt Order bars the Debtor from importing or selling product and/or (ii) the Debtor is unable to propose a confirmable plan independent of the Contempt Order's effect.

Dated: April 23, 2025  
Charlotte, North Carolina

**WOMBLE BOND DICKINSON (US) LLP**

/s/ B. Chad Ewing

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-and-

**MCCARTER & ENGLISH, LLP**

Erik Paul Belt  
James Donoian  
Anne E. Shannon

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<sup>1</sup> Debtor is the following entity (the last four digits of its taxpayer identification number follow in parentheses): Blueworks Corporation (3957). The Debtor's address is 8408 Channel Way, Waxhaw, North Carolina, 28173.

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